



September 22, 2021

Federal Communications Commission
Office of the Secretary
45 L Street, NE
Washington, DC 20554

Re: MB Docket No. 18-349

Dear Ms. Dortch

We are the owners and operators of 4 FM radio stations serving the rural, southwestern area known as St. George, Utah. Our company is family owned and personally financed. We live and work in the community we are licensed to serve. We believe that our radio stations, like those in small and medium sized communities throughout the country provide local service to listeners and businesses that large national media companies cannot provide or choose not to provide. We believe that owning a radio station in a community is fundamentally a small local business and not a transmitter for a large national company. As a small market broadcaster we consider ourselves a fiduciary of a local public trust and not an extension of a national mega company with headquartered operations thousands of miles from our community.

It is our opinion that relaxing or eliminating current ownership regulations for radio station owners and operators in medium and small markets in our country would create disastrous affects to our industry and negatively impact the communities we are licensed to serve.

The argument that relaxing radio station ownership caps would be beneficial to our industry are unfounded and in fact, could lead to the following outcomes:

- Allowing 1 company to own all of the radio stations in small or medium sized markets would destroy competition for local advertising dollars. Such monopolies would allow price fixing of advertising rates and lead to unfair business practices that would negatively affect the local businesses community. This economic affect is seen in the predatory pricing strategies of large radio groups whose practice is to price their advertising to obtain the total available ad budget. This is one major reason that radio ad revenue has not increased in the past several years, but has only been “re-distributed” to the large groups.
- If 1 owner is permitted to own all of the radio stations in a market, opportunities for local employment would be severely reduced and unemployment would increase. Consolidation of ownership always results in the reduction of employment opportunity because of perceived savings through economic “scale”. This “scale” comes at the expense of local employment opportunity. We have seen this job “consolidation “ strategy this past year in the actions taken by I Heart Radio, Audacy, and Cumulus Media among others who are trying to boost their stock prices by drastically reducing overhead through eliminating employees.
- If ownership of all of the radio stations in a community was permitted by 1 company, the diversity of programming, news and public affairs programming and community service would end because the checks and balances provided through competition would no longer exist. The impetus that local owners have to carry local football games, high school events, charity causes and town hall discussions, does not exist in the playbook of the large groups who plug in their national programming as a substitute for genuine local community service programming.

- If a single company is permitted to own all of the radio stations in a market, opportunities for minorities and women to own or manage a radio station will be foreclosed for the foreseeable future. Removing current ownership caps will allow large, well financed, Wall Street companies to gobble up most of the desirable radio stations in every market and then outsource management jobs to their regional and national hubs. This would disenfranchise local groups including minorities and women who often do not have access to the financing required to acquire good media properties.
- If radio station licenses are granted to owners committed to serve the public interest, the first priority for ownership of these licenses should be given to local groups, minorities and women, not national mega-media companies. A diversity of local owners will provide hyper-local focus to many segments in each community. Removing ownership caps and enabling 1 owner to own all of the stations in small and medium markets, necessary hyper local focus would suffer, competition would be stifled and equal opportunity for all broadcasters would be destroyed.

We implore the FCC to keep the current ownership caps for radio stations as they are and not favor the chosen few dozen Corporate owners who want the FCC to subsidize their intent to establish barriers to entry that will be impossible for small, local owners to compete with.

Respectfully,

G Craig Hanson

G. Craig Hanson, Owner
Redrock Broadcasting, Inc.
St. George, Utah

